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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GUADALUPE ESPARZA
CARBAJAL

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting
Commissioner of Social Security,

Defendant.

Case No. 1:23-cv-00319-BAM

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from June 5, 2023 to August 4, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the weeks of June 5, 2023 and June 12, 2023, Counsel

1 currently has 26 merit briefs. Counsel requires additional time to brief the issues
2 thoroughly for the Court's consideration. Defendant does not oppose the requested
3 extension. Counsel apologizes to the Defendant and Court for any inconvenience
4 this may cause.

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6 Respectfully submitted,

7 Dated: May 24, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

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9 By: /s/ Jonathan Omar Pena
10 JONATHAN OMAR PENA
11 Attorneys for Plaintiff
12

13 Dated: May 24, 2023

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration
18

19 By: */s/ Franco L. Becia
20 Franco L. Becia
21 Special Assistant United States Attorney
22 Attorneys for Defendant
23 (*As authorized by email on May 24, 2023)
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ORDER

Pursuant to stipulation and good cause appearing, Plaintiff shall serve Defendant with Plaintiff's Motion for Summary Judgment on or before August 4, 2023. All other dates in the Court's Scheduling Order shall be extended accordingly.

IT IS SO ORDERED.

Dated: May 25, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE